BORALEX

August 12, 2010

From:
Nathan Hebel
Boralex, Inc.
772 Sherbrooke St. West, Suite 200
Montreal, QC H3A 1G1

To:
Philip Giudice, Commissioner
Department of Energy Resources
100 Cambridge St. #1020
Boston, MA 02114

Dear Commissioner Giudice,

Thank you for the opportunity to provide comments on the two public meetings regarding the biomass sustainability study.

About Boralex

Employing over 300 people, Boralex operates 28 power stations with a total installed capacity of 410 MW in Canada, in the Northeastern United States, and in France. Included in this capacity is 200 MW of biomass, making Boralex the largest biomass power generator in the United States. Boralex actively participates in the RPS programs in Massachusetts, Connecticut, Maine, and New York.

The Manomet Study

With respect to the Manomet study, we would like to refer you back to the comments made by Robert Cleaves of the Biomass Power Association in the initial request for comments. We concur with Mr. Cleaves's assessment of the study. In particular, we believe that the study team responded to the specific hypothetical questions posed to them regarding the effects of whole tree harvesting in the Massachusetts forest. However, the study did not have the resources or the mandate to analyze the effects of wood residue utilization in New England regions with more mature forestry operations. In other words, the study was not able to assess the sustainability or carbon impacts of biomass power generation as it is currently being conducted in facilities across New England.

Policy Implications

Biomass power today utilizes wood residue, which allows the material to avoid the alternate fate of decomposing into methane and carbon dioxide in the forest. We strongly suggest to the Department that any new rule-making reflect the fact that the Manomet study does not contemplate current biomass operations.

Further, we suggest that any new regulations that reference efficiency standards as part of the "advanced" requirement should not be so stringent as to be impossible for a stand-alone biomass facility to meet. Efficiency standards that are unattainable do not adequately represent the statute. "Impossible" is not the same as "advanced." The study makes mention that combined heat and power projects utilizing wood residue could likely result in a net positive carbon benefit over a relatively short period of time. The study is silent to the net impact of stand-alone biomass to power facilities. Seeing as no new information has been provided on any type of biomass facility that operates with wood residue, it is clear that both combined heat and power facilities and stand-alone power facilities should continue to be eligible in Class I provided that that meet existing emission requirements.

Thank you for your consideration of these brief comments. We look forward to working with the Department to further the development of carbon-neutral biomass applications such as those currently seen in wood residue facilities across New England.

Sincerely,

Nathan Hebel
Director, Energy Trading